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14 Keith Brown

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 **KEITH BROWN**, an individual,

18 *Plaintiff,*

19 v.

20 **ARTEC GLOBAL MEDIA, INC.**, a
21 Nevada corporation; **BART AND**
22 **ASSOCIATES, LLC**, a Colorado
23 limited liability company; **STONE**
24 **DOUGLASS**, an individual; **NOVA**
25 **CAPITAL ADVISORS, LLC**, a
California limited liability company;
PETERSON SULLIVAN LLP, a
Washington limited liability
partnership; **WALTER WELSH**, an
individual; **CALEB WICKMAN**, an
individual; and **MASON**
YAMASHIRO, an individual,

26 *Defendants.*

27 **Case No. 2:17-cv-01883-JAD-PAL**

28 **NOTICE OF SETTLEMENT**

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTCE that Plaintiff KEITH BROWN (“Brown”) and
3 Defendants ARTEC GLOBAL MEDIA, INC. (“Artec”), CALEB WICKMAN
4 (“Wickman”), and STONE DOUGLASS (“Douglass”; collectively, the “Artec
5 Defendants”) have entered into a settlement agreement (the “Settlement
6 Agreement”) that obviates the need for a trial in the above-captioned matter.
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9 Pursuant to the terms of the Settlement Agreement, the Artec Defendants
10 will pay Brown monthly installments of settlement funds, the last of which is due
11 on or about February 1, 2020. The Settlement Agreement also allows Brown to
12 enter a Confession of Judgment in this Court if the Artec Defendants materially
13 breach the Settlement Agreement.
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16 Brown and the Artec Defendants respectfully request that this Court (1)
17 vacate all further dates in connection with the above-captioned matter; and (2)
18 retain jurisdiction of this matter until February 14, 2020, at which time Brown will
19 dismiss all claims and causes of action against the Artec Defendants.
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1 DATED: April 2, 2019

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3 **HOLLEY, DRIGGS, WALCH,**
4 **PUZEY & THOMPSON**

5 *s/ Brian W. Boschee*
6

7 BRIAN W. BOSCHEE, ESQ.
8 Attorneys for Keith Brown
9 (NV Bar Number 7612)

10 DATED: April 2, 2019

11 **GUSTAFSON pc**

12 *s/ J. Ryan Gustafson*
13

14 J. RYAN GUSTAFSON, ESQ.
15 Attorneys for Keith Brown
16 (CA Bar Number 220802)
17 (*Admitted pro hac vice*)

18 DATED: April 2, 2019

19 **THE MARKOWITZ LAW FIRM**

20 *s/ Warren R. Markowitz*
21

22 WARREN R. MARKOWITZ, ESQ.
23 Attorneys for the Artec Defendants

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2019, 2019, service of the foregoing **NOTICE OF SETTLEMENT** upon each of the parties via electronic service through electronic the United States District Court for the District of Nevada's ECF system to:

Warren Markowitz, Esq.
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Attorneys for Defendants

The Artec Defendants

/s/J. Ryan Gustafson

J. RYAN GUSTAFSON